

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

D. Burkey, et al.,	§	CIVIL ACTION NO.
Plaintiffs,	§	4:23-cv-01936
	§	
	§	JUDGE CHARLES ESKRIDGE
vs.	§	
	§	
Access Restoration	§	
Services US, Inc., et al.,	§	
Defendants.		

**TRIAL EXHIBIT LIST OF PLAINTIFFS:
DAVID BURKEY, JEREMY CAMPBELL, MALCOLM GREEN,
CHAS JOCHUM, RAFAEL LOUIS, NATALIE MILLER, TIMOTHY MOFFETT,
TREVON POTTS, CESAR ROMERO, TRACY RUDOLPH,
NATHANIEL RUHOFF, AND WARREN WASHINGTON**

No.	Description	Offer	Object	Date Admit	Date N/Adm
	Offer Letter – David Burkey				
	Offer Letter – Jeremy Campbell (GES Production_Butler_000042 – GES Production_Butler_000047)				
	Offer Letter – Malcolm Green (GES Production_Butler_000066 – GES Production_Butler_000071)				
	Offer Letter – Natalie Miller (GES Production_Butler_000072 – GES Production_Butler_000077)				
	Offer Letter – Trevon Potts (GES Production_Butler_000091 – GES Production_Butler_000099)				
	Offer Letter – Cesar Romero GES Production_Butler_000019 – GES Production_Butler_000024				

	Offer Letter – Tracy Rudolph (GES Production_Butler_000100 – GES Production_Butler_000105)				
	Offer Letter – Nathaniel Ruhoff (GES Production_Butler_000078 – GES Production_Butler_000083)				
	Offer Letter – Chas Jochum (GES Production_Butler_000025 – GES Production_Butler_000030)				
	Offer Letter – Rafael Louis (PLAINTIFFS 000002_Louis – PLAINTIFFS 000007_Louis)				
	Promotion Letter – Rafael Louis (GES Production_Butler_001915 – GES Production_Butler_001920)				
	Offer Letter – Timothy Moffett (GES Production_Butler_000085 – GES Production_Butler_000090)				
	Offer Letter – Warren Washington (GES Production_Butler_000085 – GES Production_Butler_000090)				
	Offer Letter – Warren Washington (GES Production_Butler_002049-002054)				
	Promotion Letter – Warren Washington (GES Production_Butler_000112 – GES Production_Butler_000127)				
	Autumn Garibay email to Field Inspectors, with Bonus Matrix (GES Production_000123-000125)				
	Termination Letter – David Burkey (GES Production_004761)				
	Termination Letter – Jeremy Campbell (GES Production_004763)				
	Termination Letter – Malcolm Green				
	Termination Letter – Natalie Miller (GES Production_004766)				
	Termination Letter – Trevon Potts				

	(GES Production_004770)				
	Termination Letter – Cesar Romero (GES Production_004759)				
	Termination Letter – Tracy Rudolph (GES Production_004769)				
	Termination Letter – Nathaniel Ruhoff (GES Production_004773)				
	Termination Letter – Chas Jochum (GES Production_004760)				
	Termination Letter – Rafael Louis (GES Production_004767)				
	Termination Letter – Timothy Moffett (GES Production_004768)				
	Termination Letter – Warren Washington (GES Production_004772)				
	Warren Washington: Bonus structure and data.xlsm (PLAINTIFFS 000026_Washington)				
	Warren Washington: GES - Bonus Structure - Field and Management (1).xlsx (PLAINTIFFS 000025_Washington)				
	Malcolm Green: Photos from Fort Myers, Q4-2022 – by Malcolm Green (PLAINTIFFS 000027_Green – PLAINTIFFS 000029_Green, PLAINTIFFS 000036_Green)				
	Malcolm Green: “Field Team Bonus’s [sic]” email, August 2022 (Malcolm Green screenshots) (PLAINTIFFS 000030_Green, PLAINTIFFS 000034_Green, PLAINTIFFS 000032_Green)				
	Malcolm Green: Inspection Tracking App Screenshots, October-December 2022 (PLAINTIFFS 000054_Green,				

	PLAINTIFFS 000065 _Green, PLAINTIFFS 000064 _Green, PLAINTIFFS 000063 _Green, PLAINTIFFS 000062 _Green, PLAINTIFFS 000061 _Green, PLAINTIFFS 000060 _Green, PLAINTIFFS 000057 _Green, PLAINTIFFS 000056 _Green, PLAINTIFFS 000055 _Green, PLAINTIFFS 000059 _Green, PLAINTIFFS 000058 _Green)				
	Chas Jochum: Image of Wex Fleet Card – ARS GEM (PLAINTIFFS 000825 _Jochum)				
	Natalie Miller: Image of Wex Fleet Card – ARS GEM (PLAINTIFFS 000263 _Miller)				
	Natalie Miller: Screenshots of Autumn Garibay email with bonus matrix, August 2022 (PLAINTIFFS 000496 _Miller, PLAINTIFFS 000493 _Miller, PLAINTIFFS 000494 _Miller)				
	Natalie Miller: Screenshots of ARS GEM Inspection Credit Counter App screens for Natalie Miller inspections, Q4-2023 (PLAINTIFFS 000264 _Miller – PLAINTIFFS 000357 _Miller)				
	Natalie Miller: Screenshots of GES training PowerPoint, taken by Natalie Miller (PLAINTIFFS 000238 _Miller, PLAINTIFFS 000232 _Miller, PLAINTIFFS 000231 _Miller)				
	Natalie Miller: Wells Fargo statements of Natalie Miller showing payroll deposits by ARS (PLAINTIFFS 000542-000568 _Miller)				
	Natalie Miller:				

	<p>Images of ARS GEM sketch sheets, taken by Natalie Miller</p> <p>File Names:</p> <p><i>Photo Oct 03 2022, 2 38 07 PM.jpg,</i></p> <p><i>Photo Oct 03 2022, 2 38 03 PM.jpg</i></p> <p>(produced but not bates-stamped)</p>				
	<p>Natalie Miller:</p> <p>Photos of ARS GEM trucks and equipment in southwest Florida, taken by Natalie Miller</p> <p>File Names:</p> <p><i>Photo Sep 28 2022, 4 15 22 AM.jpg,</i></p> <p><i>Photo Sep 28 2022, 4 15 10 AM.jpg,</i></p> <p><i>Photo Sep 28 2022, 4 16 22 AM.jpg,</i></p> <p><i>Photo Sep 28 2022, 4 16 25 AM.jpg</i></p> <p>(produced but not bates-stamped)</p>				
	<p>Cesar Romero:</p> <p>Bank statement of Cesar Romero showing deposits by ARS</p> <p>PLAINTIFFS 000580_Romero</p>				
	<p>Cesar Romero:</p> <p>Screenshot of Cesar Romero's Q4-2022 Job Inspection Count at 260 total</p> <p>(PLAINTIFFS 000581_Romero – PLAINTIFFS 000582_Romero)</p>				
	<p>Cesar Romero:</p> <p>Video of Cesar Romero scrolling through his email confirmations of inspections in Microsoft Outlook emails, Q4-2022</p> <p>(PLAINTIFFS 000617_Romero)</p>				
	<p>Cesar Romero:</p> <p>Video of Cesar Romero scrolling through his Q4-2022 inspection calendar on his company cellphone</p> <p>(PLAINTIFFS 000618_Romero)</p>				
	<p>Nathaniel Ruhoff:</p> <p>GES - Storm Team Job Tracking Form - Hurricane IAN (78 forms)</p> <p>(PLAINTIFFS 000676_Ruhoff, PLAINTIFFS 000753_Ruhoff)</p>				
	Nathaniel Ruhoff:				

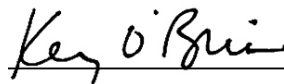
	Text of GES emails copied by Nate Ruhoff (PLAINTIFFS 000757_Ruhoff)				
	Nathaniel Ruhoff: Text of GES email re: MMA partnership, copied by Nate Ruhoff PLAINTIFFS 000756_Ruhoff				
	Warren Washington: Screenshot of payroll deposits to Warren Washington by ARS				
	<p>Emails concerning early discussion and drafting of the Field Inspector bonus plan:</p> <ul style="list-style-type: none"> • GES Production_003422, et seq. (Needham emails 02/27/2022); • GES Production_003541, et seq. (Normoyle emails 03/02/2022) • GES Production_003543, et seq. (Needham emails 03/11/2022) • GES Production_003536, et seq. (Needham emails 03/11/2022); • GES Production_001831-001839 (Needham emails 03/25/2022); • GES Production_003489, et seq. (Needham emails 03/29/2022); • GES Production_003532, et seq. (Garibay emails 04/08/2022); • GES Production_003415, et seq. (Needham emails 04/08/2022); • GES Production_000321-000323; 000515, et seq. (Garibay/Normoyle emails 06/22/2022); • GES Production_001848, et seq. (Garibay meeting invite re: bonuses 06/29/2022). 				
	<p>Assorted emails involving ARS:</p> <ul style="list-style-type: none"> • GES Production_000520, 000561, et seq. (Garibay/Adams emails 07/08/2022 and 07/15/2022); • GES Production_001146, et seq. (Ali email 10/17/2022); 				

	<ul style="list-style-type: none"> • GES Production_002064, et seq. (Ali email 10/17/2022); • GES Production_001167 (Garibay email 10/19/2022); • GES Production_001177 (Adams email 10/21/2022); • GES Production_002394, et seq. (Anglin email 12/19/2022); 				
	<p>Moffett emails to Garibay, August 2022:</p> <ul style="list-style-type: none"> • GES Production_000391, et seq. (08/04/2022); • GES Production_000565, et seq. (08/09/2022). 				
	<p>Garibay emails October 2022:</p> <ul style="list-style-type: none"> • GES Production_000413, et seq. (10/06/2022); • GES Production_000416, et seq. (10/06/2022); • GES Production_000426, et seq. (10/06/2022). 				
	<p>Internal bonus discussion emails, 2023:</p> <ul style="list-style-type: none"> • GES Production_003343, et seq. (Email 04/10/2023); • GES Production_003344-3350, et seq. (Emails re: N. Miller bonus demand 04/14/2023); • GES Production_000445, et seq. (Normoyle emails 04/16/2023); • GES Production_003351, et seq. (Normoyle emails 04/17/2023); • GES Production_003595, et seq. (Normoyle emails 04/17/2023); • GES Production_002989, et seq. (Garibay emails 04/25/2023); • GES Production_002990, et seq. (Garibay emails 05/10/2023). 				

	Field Supervisor Job Description <ul style="list-style-type: none"> GES Production_000314, et seq. 				
	Garibay emails re: supervisor teams 2023 <ul style="list-style-type: none"> GES Production_000431-000438 				
	Garibay email with organizational chart <ul style="list-style-type: none"> GES Production_003017-003018 (06/13/2022) 				
	List of employees <ul style="list-style-type: none"> GES Production_003593-3594 				
	Emails re: Garibay's bonus <ul style="list-style-type: none"> GES Production_003449-003458 (Emails 02/13/2023) 				
	Scott Jacobi/finances emails Oct.-Dec. 2022 <ul style="list-style-type: none"> GES Production_003056-003058, 003062 (emails 10/22/2022); GES Production_003087-003088 (emails 11/20/2022); GES Production_003315-003316 (emails 12/20/2022). 				
	Assorted emails re: Needham and Normoyle control: <ul style="list-style-type: none"> GES Production_002077 (emails 03/13/2022); GES Production_002111-2112 (emails 03/29/2022); GES Production_003320-003321 (emails 12/30/2022). 				
	Customer surveys produced by GES; chart: <ul style="list-style-type: none"> GES Production_003741-003748 				
	Holt email and chart <ul style="list-style-type: none"> GES Production_003602-003604 				

	David Burkey: Individual inspection data produced by GES				
	Jeremy Campbell: Individual inspection data produced by GES <ul style="list-style-type: none">• GES Production_003873-003891				
	Malcolm Green: Individual inspection data produced by GES <ul style="list-style-type: none">• GES Production_003979-004004				
	Natalie Miller: Individual inspection data produced by GES <ul style="list-style-type: none">• GES Production_004050-004072				
	Cesar Romero: Individual inspection data produced by GES <ul style="list-style-type: none">• GES Production_003758-003782				
	Tracy Rudolph: Individual inspection data produced by GES <ul style="list-style-type: none">• GES Production_004121-004144				
	Nathaniel Ruhoff: Individual inspection data produced by GES <ul style="list-style-type: none">• GES Production_004073-004096				

Respectfully submitted,



January 3, 2025
Date

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